

# **Declaration of Christopher Carney**

# **Exhibit A**

**Carney Gillespie Isitt PLLP**

600 1st Avenue  
Suite LL08  
WA US  
(206) 890-6403  
<http://www.cgilaw.com>

**BILL TO**

Trueblood litigation: 14-cv-01178 MJP

05/06/2015	Review court's order on reconsideration. - Christopher Carney	0:12	395.00	79.00
05/11/2015	Review email re: DSHS efforts to coordinate scheduling with defense attorneys for evaluations. - Christopher Carney	0:06	395.00	39.50
05/12/2015	Emails with co-counsel relating to plan for ongoing monitoring of injunction. - Christopher Carney	0:18	395.00	118.50
06/05/2015	Review monthly report from defendants. Meeting with co-counsel to discuss strategy for ongoing monitoring of injunction. - Christopher Carney	2:54	395.00	1,145.50
06/06/2015	Work on review of Defendants' waitlist report. - Christopher Carney	0:30	395.00	197.50
06/09/2015	Review email from opposing counsel re: timing of compliance reports. - Christopher Carney	0:06	395.00	39.50
06/18/2015	Legal research, telephone call with co-counsel re: monitoring plan. - Christopher Carney	0:36	395.00	237.00
06/18/2015	Review Defendants' waitlist data, analyze progress toward compliance. - Christopher Carney	0:36	395.00	237.00
06/23/2015	Review letter forwarded by court. - Christopher Carney	0:06	395.00	39.50
06/24/2015	Review defendants' weekly waitlists, compare to previous week to analyze progress. - Christopher Carney	0:18	395.00	118.50
07/02/2015	Review and analyze defendants' long term plan submission to the court, begin work on response. - Christopher Carney	2:06	395.00	829.50
07/14/2015	Review and analyze Defendants' 94-page July monthly report and data. - Christopher Carney	3:06	395.00	1,224.50
07/21/2015	Work on draft response to monitor of Plaintiff concerns relating to Defendants' long term plan. - Christopher Carney	0:54	395.00	355.50
07/28/2015	Work on draft of letter to court monitor re: concerns with Defendants' compliance and long-term plan. - Christopher Carney	0:36	395.00	237.00
07/29/2015	Work on draft of letter to court monitor re: Plaintiff concerns with Defendants' compliance and long-term plan. - Christopher Carney	0:18	395.00	118.50
08/18/2015	Review photographs and report of tour of Maple Lane facility. - Christopher Carney	0:12	395.00	79.00
08/18/2015	Receive and analyze Defendants' August monthly compliance report. - Christopher Carney	1:24	395.00	553.00
08/19/2015	Receive and analyze monitor's quarterly report. - Christopher Carney	3:06	395.00	1,224.50
08/24/2015	Review Defendants' and Monitor's reports, prepare for and participate in conference call with co-counsel relating to all parties meeting with monitor. - Christopher Carney	2:12	395.00	869.00

09/01/2015	Receive and review Defendants' proposed order amending reporting date for monitor reports. - Christopher Carney	0:12	395.00	79.00
09/10/2015	Review order granting motion to amend reporting date. - Christopher Carney	0:06	395.00	39.50
10/27/2015	Review and analyze Defendants' monthly report. - Christopher Carney	1:06	395.00	434.50
10/29/2015	Review and analyze Monitor's experts' reports on Defendants' alternate site programs. - Christopher Carney	2:06	0.00	0.00
11/02/2015	Review and edit draft proposed all parties meeting agenda. - Christopher Carney	0:18	395.00	118.50
11/03/2015	Review Quigley letter to DSHS staff, discuss response with co-counsel. - Christopher Carney	0:24	395.00	158.00
11/04/2015	Teleconference with co-counsel, discuss Quigley letter and proposed responses, discuss Defendants' progress toward compliance with injunction. - Christopher Carney	0:42	395.00	276.50
11/08/2015	Review monitor's proposed party meeting agenda, emails to co-counsel regarding proposed edits. - Christopher Carney	0:18	395.00	118.50
11/09/2015	Prepare for and attend all parties meeting with monitor. - Christopher Carney	3:18	395.00	1,303.50
11/09/2015	Legal research relating to Defendants' claims of difficulties negotiating with unions to fill positions at state hospital. - Christopher Carney	2:18	395.00	908.50
11/10/2015	Review draft correspondence to Defendants relating to issues discussed at all parties meeting with monitor. - Christopher Carney	0:12	395.00	79.00
11/16/2015	Work on analysis of Defendants' current compliance and efforts toward same, teleconference with co-counsel re: same. - Christopher Carney	2:24	395.00	948.00
11/20/2015	Emails with opposing counsel. - Christopher Carney	0:18	395.00	118.50
11/25/2015	Work on review of Defendants' monthly report to monitor. - Christopher Carney	1:42	395.00	671.50
11/27/2015	Review and analyze documents from Defendants including documents relating to proposed alternate sites. - Christopher Carney	5:18	395.00	2,093.50
12/01/2015	Review documents relating to prior malpractice concerns about Defendants' proposed vendor for contract medical services at alternate site, legal research and review pleadings on litigation involving same. - Christopher Carney	1:48	395.00	711.00
12/04/2015	Email correspondence with court monitor relating to Plaintiffs' concerns relating to Correct Care Solutions. - Christopher Carney	0:12	395.00	79.00
12/10/2015	Analyze ongoing compliance issues; review documents pertaining to class-member harms, Pinals report, conference call with co-counsel. - Christopher Carney	4:12	395.00	1,659.00
12/11/2015	Review documents received from Defendants relating to Pinals report, Defendants' efforts to coordinate with counties. - Christopher Carney	3:06	395.00	1,224.50
12/18/2015	Receive and analyze Defendants' monthly report to court monitor, compare to prior monthly reports. - Christopher Carney	2:06	395.00	829.50
12/22/2015	Work on letter to court requesting hearing on status of Defendants' compliance, review possible attachments to same. - Christopher Carney	2:18	395.00	908.50
12/29/2015	Work on stipulation and order to set status conference hearing. - Christopher Carney	0:12	395.00	79.00
12/31/2015	Receive and review Defendants' motion to modify injunction, review supporting documents, legal research for response. - Christopher Carney	6:18	395.00	2,488.50
01/06/2016	Receive and review copy of correspondence between Defendants and CMS, review new pattern form orders in competency cases created with Defendants' input. - Christopher Carney	0:54	395.00	355.50
01/09/2016	Work on review of court Monitor's 583 page report to court, review and analyze past monthly reports. - Christopher Carney	6:18	395.00	2,488.50

01/15/2016	Receive and review Defendants' reply on motion to modify injunction; legal research. - Christopher Carney	2:06	395.00	829.50
01/20/2016	Receive and review list of topics for status conference hearing from court, work on preparation for hearing. - Christopher Carney	2:06	395.00	829.50
01/21/2016	Work on preparation for status conference hearing. - Christopher Carney	2:06	395.00	829.50
01/22/2016	Work on hearing preparation. - Christopher Carney	2:18	395.00	908.50
01/24/2016	Work on preparation for status conference hearing. - Christopher Carney	3:12	395.00	1,264.00
01/25/2016	Work on preparation for and attend status conference hearing. - Christopher Carney	7:06	395.00	2,804.50
01/26/2016	Work on timelines for compliance by Defendants, review data from monthly reports. - Christopher Carney	2:18	395.00	908.50
01/30/2016	Work on review of new state court forms relating to alternate sites. - Christopher Carney	0:24	395.00	158.00
02/02/2016	Prepare for and participate in conference call with Defendants regarding possible agreed benchmarks for compliance during extension. - Christopher Carney	2:06	395.00	829.50
02/02/2016	Receive and analyze Defendants' response to Pinals report, review data from prior monthly reports. - Christopher Carney	1:48	395.00	711.00
02/08/2016	Receive and analyze Court's order modifying injunction, legal research. - Christopher Carney	3:18	395.00	1,303.50
02/11/2016	Receive and review letter from court. - Christopher Carney	0:12	395.00	79.00
02/17/2016	Review correspondence between court monitor and Defendants relating to ongoing efforts toward compliance. - Christopher Carney	0:18	395.00	118.50
02/19/2016	Review Defendants' uniform orders submission, sealed order of the Court. - Christopher Carney	0:54	395.00	355.50
02/22/2016	Review documents and correspondence between monitor and defendants concerning efforts toward interim benchmarks for compliance. - Christopher Carney	1:18	395.00	513.50
02/25/2016	Review and analyze Pinals report on alternate site. - Christopher Carney	1:06	395.00	434.50
02/25/2016	Review and analyze defendants' monthly report to monitor. - Christopher Carney	2:18	395.00	908.50
02/29/2016	Work on correspondence to court monitor relating to Plaintiffs' concerns with alternate site. - Christopher Carney	1:06	395.00	434.50
03/02/2016	Work on review and analysis of memorandum from defendants to court monitor, detailing actions taken toward compliance; review monthly reports for cross-reference. - Christopher Carney	1:18	395.00	513.50
03/02/2016	Work on review of defendants' current waitlist numbers. - Christopher Carney	0:36	395.00	237.00
03/06/2016	Review and analyze Pinals' replies to defendants' comments on report relating to alternate site. - Christopher Carney	0:24	395.00	158.00
03/07/2016	Review correspondence from court, court monitor. - Christopher Carney	0:12	395.00	79.00
03/08/2016	Work on preparation for upcoming status hearing. - Christopher Carney	1:24	395.00	553.00
03/09/2016	Teleconference with co-counsel concerning site visit with court and monitor, work on preparation for upcoming status hearing. - Christopher Carney	2:18	395.00	908.50
03/10/2016	Review and analyze reports of experts retained by monitor relating to tour of alternate facility and management of same. - Christopher Carney	1:06	395.00	434.50
03/10/2016	Review and analyze defendants' submission for hearing, work on preparation for hearing, attend hearing. - Christopher Carney	3:54	395.00	1,540.50
03/11/2016	Work on Plaintiff's response to defendants' draft triage protocol. - Christopher Carney	0:24	395.00	158.00
03/11/2016	Work on preparation for planned motion for contempt, legal research. - Christopher Carney	4:06	395.00	1,619.50

03/16/2016	Work on draft of motion for TRO relating to alternate site. - Christopher Carney	3:48	395.00	1,501.00
03/17/2016	Work on drafting brief for motion for TRO relating to alternate site. - Christopher Carney	2:54	395.00	1,145.50
03/18/2016	Review legislation authorizing and funding alternate sites in preparation for reply brief in support of motion for TRO; receive and review transcripts of prior status hearing for same. - Christopher Carney	2:42	395.00	1,066.50
03/19/2016	Review and analyze defendants' briefing and supporting documents relating to motion for TRO, work on reply brief. - Christopher Carney	3:54	395.00	1,540.50
03/21/2016	Review and analyze report of monitor's experts relating to alternate site. - Christopher Carney	0:36	395.00	237.00
03/22/2016	Work on reply brief in support of motion for TRO. - Christopher Carney	3:42	395.00	1,461.50
03/23/2016	Work on reply brief in support of motion for TRO. - Christopher Carney	5:12	395.00	2,054.00
03/24/2016	Work on reply brief for TRO. - Christopher Carney	2:12	395.00	869.00
03/24/2016	Work on review of defendants' monthly report. - Christopher Carney	1:54	395.00	750.50
03/26/2016	Review defendants' responses to monitor-retained expert report relating to alternate site. - Christopher Carney	1:06	395.00	434.50
03/29/2016	Work on preparation for oral argument on TRO motion, teleconference with co-counsel relating to same. - Christopher Carney	2:36	395.00	1,027.00
04/01/2016	Review correspondence from C. Reyes relating to interference with inspection of alternate site. - Christopher Carney	0:12	395.00	79.00
04/05/2016	Receive and review documents pertaining to staffing and scheduling of alternate site. - Christopher Carney	0:18	395.00	118.50
04/06/2016	Work on preparation for hearing on motion for TRO relating to Yakima facility. - Christopher Carney	3:48	395.00	1,501.00
04/07/2016	Review licensing documents pertaining to Yakima facility. - Christopher Carney	0:12	395.00	79.00
04/07/2016	Receive and review Defendants' documents submitted in connection with TRO hearing, work on preparation for hearing. - Christopher Carney	2:54	395.00	1,145.50
04/12/2016	Review court's order granting TRO. - Christopher Carney	0:12	395.00	79.00
04/12/2016	Review triage memorandum sent to system partners by Defendants. - Christopher Carney	0:18	395.00	118.50
04/15/2016	Receive and analyze new training/policy for seclusion at alternate facility, update from Defendants on progress in meeting TRO requirements. - Christopher Carney	1:06	395.00	434.50
04/19/2016	Work on preparation for possible motion for contempt, legal research for same; analyze Defendants' waitlist data. - Christopher Carney	4:24	395.00	1,738.00
04/21/2016	Work on motion to extend TRO. - Christopher Carney	1:48	395.00	711.00
04/22/2016	Review Pinals supplemental report on alternate site and seclusion/restraint policy. Work on motion to extend TRO, file same. - Christopher Carney	2:54	395.00	1,145.50
04/23/2016	Review and analyze Defendants' submission to court monitor relating to revisions to long-term plan. - Christopher Carney	1:48	395.00	711.00
04/25/2016	Review Defendants' response to motion to extend TRO, legal research. - Christopher Carney	1:54	395.00	750.50
04/26/2016	Review court's order granting motion to extend TRO. - Christopher Carney	0:06	395.00	39.50
04/27/2016	Work on motion for contempt. - Christopher Carney	3:42	395.00	1,461.50
05/02/2016	Work on planned contempt motion, legal research for same. - Christopher Carney	2:54	395.00	1,145.50
05/03/2016	Work on drafting brief on motion for contempt, review supporting documents, legal research. - Christopher Carney	6:12	395.00	2,449.00
05/05/2016	Work on preparation of documents for filing in connection with status hearing and contempt motion. - Christopher Carney	4:06	395.00	1,619.50

05/05/2016	Receive and review documents pertaining to architectural plan for stairwell safety retrofit at alternate site. - Christopher Carney	0:24	395.00	158.00
05/06/2016	Review and analyze Ninth Circuit opinion, legal research, teleconference with co-counsel, discuss ramifications for contempt and other planned motions. - Christopher Carney	3:18	395.00	1,303.50
05/07/2016	Analysis of Ninth Circuit opinion, legal research, work on drafting of possible expansions to clinical and non-clinical exceptions. - Christopher Carney	6:18	395.00	2,488.50
05/08/2016	Work on review and analysis of defendants' response to Pinals concerns. - Christopher Carney	1:06	395.00	434.50
05/09/2016	Work on preparation for status hearing; work on documents for same. - Christopher Carney	2:18	395.00	908.50
05/10/2016	Work on briefing for motion for contempt, legal research. - Christopher Carney	5:54	395.00	2,330.50
05/10/2016	Review and analyze defendants' submission for status hearing, work on preparation for status hearing. - Christopher Carney	1:54	395.00	750.50
05/12/2016	Work on motion for temporary restraining order, legal research. - Christopher Carney	3:06	395.00	1,224.50
05/13/2016	Work on motion for temporary restraining order, legal research for same. - Christopher Carney	5:06	395.00	2,014.50
05/14/2016	Work on motion for temporary restraining order. - Christopher Carney	3:24	395.00	1,343.00
05/16/2016	Review and analyze defendants' responsive documents re: concerns with alternate site. - Christopher Carney	1:54	395.00	750.50
05/18/2016	Work on analysis of issues for termination or continuation of TRO. - Christopher Carney	2:06	395.00	829.50
05/19/2016	Work on motion for TRO. - Christopher Carney	1:42	395.00	671.50
05/20/2016	Review court's order on TRO. - Christopher Carney	0:12	395.00	79.00
05/21/2016	Review and analyze defendants' TRO response and supporting documents; legal research. - Christopher Carney	3:06	395.00	1,224.50
05/23/2016	Review monthly waitlist data, cross-reference with prior monthly data. - Christopher Carney	1:06	395.00	434.50
05/23/2016	Work on briefing for motion following Ninth Circuit remand; legal research for same. - Christopher Carney	3:54	395.00	1,540.50
05/24/2016	Work on briefing for motion following Ninth Circuit remand, review trial transcripts and legal research. - Christopher Carney	8:54	395.00	3,515.50
05/26/2016	Work on contempt briefing. - Christopher Carney	2:54	395.00	1,145.50
05/30/2016	Work on TRO reply brief. - Christopher Carney	2:24	395.00	948.00
05/31/2016	Work on briefing for motion following remand; legal research, prepare supporting documents and trial transcript citations. - Christopher Carney	5:54	395.00	2,330.50
06/01/2016	Work on briefing for motion to reimpose injunction following remand from Ninth Circuit. - Christopher Carney	9:48	395.00	3,871.00
06/02/2016	Work on briefing for remand motion. - Christopher Carney	6:12	395.00	2,449.00
06/03/2016	Work on TRO reply brief. - Christopher Carney	1:36	395.00	632.00
06/06/2016	Review court's order granting TRO. - Christopher Carney	0:12	395.00	79.00
06/06/2016	Work on review and analysis of new proposed policy on strip searches at alternate sites. - Christopher Carney	0:18	395.00	118.50
06/07/2016	Review and analyze defendants' motion to terminate TRO. - Christopher Carney	0:48	395.00	316.00
06/07/2016	Review and analyze defendants' response to contempt motion, legal research, begin work on reply brief. - Christopher Carney	3:18	395.00	1,303.50
06/08/2016	Work on reply brief for contempt motion; legal research. - Christopher Carney	3:42	395.00	1,461.50
06/09/2016	Work on reply brief for contempt motion, legal research and gather supporting documents. - Christopher Carney	5:12	395.00	2,054.00

06/09/2016	Work on contempt motion reply brief; legal research, review discovery and work on preparing exhibits and trial testimony excerpts. - Christopher Carney	4:18	395.00	1,698.50
06/10/2016	Work on contempt reply brief. - Christopher Carney	5:54	395.00	2,330.50
06/15/2016	Work on preparation for assigned witness examinations for contempt hearing, prepare exhibits for same. - Christopher Carney	6:42	395.00	2,646.50
06/17/2016	Work on preparation for witness examinations for contempt hearing, work on preparation of exhibits for same. - Christopher Carney	5:30	395.00	2,172.50
06/18/2016	Work on drafting witness examinations for contempt hearing, review discovery and prepare exhibits for same. - Christopher Carney	8:18	395.00	3,278.50
06/19/2016	Work on preparation for contempt hearing. - Christopher Carney	7:24	395.00	2,923.00
06/20/2016	Prepare for and attend contempt hearing. - Christopher Carney	10:42	395.00	4,226.50
06/21/2016	Review and analyze defendants' remand response brief, work on reply. - Christopher Carney	3:06	395.00	1,224.50
06/21/2016	Preparation for hearing; attend hearing. - Christopher Carney	8:18	395.00	3,278.50
06/22/2016	Work on remand reply brief, legal research. - Christopher Carney	4:54	395.00	1,935.50
06/23/2016	Work on remand reply. - Christopher Carney	3:06	395.00	1,224.50
06/24/2016	Work on drafting remand reply brief, drafting declarations and gathering supporting documents, file same. - Christopher Carney	5:36	395.00	2,212.00
06/29/2016	Receive and analyze monthly waitlist data. - Christopher Carney	0:42	395.00	276.50
06/30/2016	Review and analyze defendants' motion to reconsider scope of injunction. - Christopher Carney	2:12	395.00	869.00
07/02/2016	Review and analyze defendants' monthly compliance report. - Christopher Carney	1:24	395.00	553.00
07/06/2016	Work on response to defendants' motion to reconsider scope of injunction. - Christopher Carney	2:18	395.00	908.50
07/09/2016	Work on drafting brief in response to defendants' motion to reconsider scope of injunction. - Christopher Carney	4:18	395.00	1,698.50
07/09/2016	Review court's order on contempt. - Christopher Carney	0:24	395.00	158.00
07/10/2016	Work on drafting response to defendants' motion to reconsider scope of injunction, legal research. - Christopher Carney	8:12	395.00	3,239.00
07/11/2016	Work on response to defendants' motion to reconsider. - Christopher Carney	3:42	395.00	1,461.50
07/13/2016	Work on preparation for hearing on motion pertaining to Ninth Circuit remand. - Christopher Carney	3:18	395.00	1,303.50
07/13/2016	Review monthly waitlist data from defendants. - Christopher Carney	0:36	395.00	237.00
07/15/2016	Review and analyze defendants' reply on motion to reconsider scope of injunction, Kinlen declaration and attachments. - Christopher Carney	1:24	395.00	553.00
07/19/2016	Work on preparation for remand hearing, review transcripts of contempt hearing. - Christopher Carney	5:06	395.00	2,014.50
07/20/2016	Work on preparation for remand hearing, review monthly waitlist data. - Christopher Carney	2:06	395.00	829.50
07/21/2016	Work on preparation for remand hearing. - Christopher Carney	2:06	395.00	829.50
07/21/2016	Review and analyze defendants' motion for reconsideration of contempt. - Christopher Carney	0:54	395.00	355.50
07/22/2016	Work on preparation for remand hearing; edit opening and closing argument drafts. - Christopher Carney	2:18	395.00	908.50
07/24/2016	Work on preparation for remand hearing, work on witness examinations. - Christopher Carney	4:18	395.00	1,698.50
07/25/2016	Preparation for remand hearing, attend remand hearing. - Christopher Carney	4:54	395.00	1,935.50
07/25/2016	Travel: prepare for and attend hearing on remand issues from Ninth Circuit. - Christopher Carney	4:42	395.00	1,856.50

07/26/2016	Work on drafting of proposed findings and conclusions for order following remand. Legal research. - Christopher Carney	2:42	395.00	1,066.50
07/28/2016	Work on response to defendants' motion to reconsider contempt. - Christopher Carney	2:06	395.00	829.50
07/29/2016	Work on response to defendants' motion to reconsider, work on proposed findings and conclusions. - Christopher Carney	4:36	395.00	1,817.00
07/30/2016	Review and analyze defendants' proposed findings and conclusions pertaining to motion following remand; legal research. - Christopher Carney	1:48	395.00	711.00
08/02/2016	Review and analyze correspondence from defendants relating to triage plan. - Christopher Carney	0:36	395.00	237.00
08/04/2016	Work on correspondence to defendants relating to triage plan, stakeholders to notify. - Christopher Carney	0:18	395.00	118.50
08/11/2016	Review correspondence from court. - Christopher Carney	0:12	395.00	79.00
08/15/2016	Review and analyze court order modifying injunction, legal research. - Christopher Carney	1:24	395.00	553.00
08/15/2016	Review and analyze defendants' monthly wait list data. - Christopher Carney	0:30	395.00	197.50
08/17/2016	Receive and review additional waitlist data. - Christopher Carney	0:42	395.00	276.50
08/17/2016	Receive and analyze court's order on reconsideration. - Christopher Carney	0:12	395.00	79.00
08/18/2016	Review and analyze draft diversion plan. - Christopher Carney	1:06	395.00	434.50
08/19/2016	Review court's order denying reconsideration. - Christopher Carney	0:12	395.00	79.00
08/23/2016	Review waitlist data. - Christopher Carney	0:18	395.00	118.50
08/23/2016	Work on correspondence to defendants relating to triage and medication concerns. - Christopher Carney	0:24	395.00	158.00
08/24/2016	Review WSH waitlist data. - Christopher Carney	0:36	395.00	237.00
09/02/2016	Review current waitlist data for ESH and WSH. - Christopher Carney	0:48	395.00	316.00
09/02/2016	Work on correspondence to defendants relating to plan for steps toward compliance with modified injunction. - Christopher Carney	0:36	395.00	237.00
09/13/2016	Work on plan for proposed stipulation for steps toward compliance with modified injunction. - Christopher Carney	0:42	395.00	276.50
09/14/2016	Work on draft stipulation to extend deadline for compliance on agreed conditions. - Christopher Carney	0:48	395.00	316.00
09/15/2016	Review and analyze defendants' proposed edits to draft stipulation for extension of deadlines; work on correspondence to defendants regarding same. - Christopher Carney	2:48	395.00	1,106.00
09/16/2016	Work on review of weekly waitlist data. - Christopher Carney	0:30	395.00	197.50
09/23/2016	Review weekly waitlist data. - Christopher Carney	0:24	395.00	158.00
10/12/2016	Review and analyze reports from monitor's experts relating to alternate sites. - Christopher Carney	1:06	395.00	434.50
10/17/2016	Receive, review and analyze "root cause" analysis report re: WSH. - Christopher Carney	2:42	395.00	1,066.50
10/27/2016	Review new waitlist data. - Christopher Carney	0:30	395.00	197.50
10/31/2016	Work on review of monthly report. - Christopher Carney	1:06	395.00	434.50
11/03/2016	Prepare for and participate in pre-mediation call. - Christopher Carney	1:18	395.00	513.50
11/09/2016	Work on editing draft mediation status report. - Christopher Carney	0:42	395.00	276.50
11/14/2016	Telephone call to opposing counsel, work on draft status report to mediator. - Christopher Carney	1:42	395.00	671.50
11/14/2016	Receive and review letter from defendants re: mediation. - Christopher Carney	0:06	395.00	39.50
11/22/2016	Email correspondence with Defendants, mediator. - Christopher Carney	0:24	395.00	158.00

11/22/2016	Work on review of documents pertaining to triage protocol. - Christopher Carney	0:48	395.00	316.00
11/22/2016	Review waitlist report from Defendants. - Christopher Carney	0:24	395.00	158.00
11/30/2016	Review weekly waitlist report from Defendants. - Christopher Carney	0:18	395.00	118.50
12/12/2016	Work on mediation statement. - Christopher Carney	1:18	395.00	513.50
12/14/2016	Work on review of Defendants' mediation package. - Christopher Carney	0:48	395.00	316.00
12/14/2016	Work on review of Corrective Action Plan for Western State Hospital. - Christopher Carney	1:06	395.00	434.50
12/15/2016	Work on motion to correct contempt fine errors. - Christopher Carney	0:36	395.00	237.00
12/20/2016	Preparation for mediation. - Christopher Carney	1:06	395.00	434.50
12/20/2016	Work on review and editing Seattle Foundation agreement. - Christopher Carney	0:24	395.00	158.00
12/21/2016	Travel; attend mediation, work on drafting agreement. - Christopher Carney	8:42	395.00	3,436.50
12/22/2016	Review monthly waitlist data, cross reference with prior months. - Christopher Carney	0:48	395.00	316.00
01/04/2017	Work on preparation for status hearing; work on written questions requested by court, review pleadings and discovery. - Christopher Carney	4:18	425.00	1,827.50
01/10/2017	Work on agreement to modify injunction following mediation/settlement. - Christopher Carney	0:30	425.00	212.50
01/10/2017	Work on preparation for witness examinations for upcoming status/evidentiary hearing, work on identifying and preparing exhibits. - Christopher Carney	5:42	425.00	2,422.50
01/11/2017	Hearing preparation; work on witness examinations and exhibits. - Christopher Carney	6:54	425.00	2,932.50
01/12/2017	Telephone calls and emails with defense counsel; work on agreement to modify injunction. - Christopher Carney	1:18	425.00	552.50
01/13/2017	Receive and review declaration of Kinlen with attachments. Review documents and prepare for status hearing witness examinations. - Christopher Carney	4:42	425.00	1,997.50
01/18/2017	Work on preparation for witness examinations at status hearing; review documents and prepare exhibits. - Christopher Carney	6:06	425.00	2,592.50
01/19/2017	Prepare for status hearing; travel to court, represent clients at status hearing. - Christopher Carney	10:06	425.00	4,292.50
01/20/2017	Work on preparation for continuation of status/evidentiary hearing; prepare for witness examinations. - Christopher Carney	5:06	425.00	2,167.50
01/22/2017	Work on preparation for status hearing, prepare exhibits, legal research, work on witness examinations. - Christopher Carney	5:06	425.00	2,167.50
01/23/2017	Prepare for status hearing; travel to court, represent clients at status hearing. - Christopher Carney	10:48	425.00	4,590.00
01/24/2017	Review additional exhibits from defendants, prepare for status hearing, travel to court, represent clients at status hearing. - Christopher Carney	8:54	425.00	3,782.50
01/26/2017	Work on plaintiffs' request for relief for status hearing, legal research. - Christopher Carney	1:06	425.00	467.50
01/30/2017	Work on review and editing of Plaintiffs' compliance plan. - Christopher Carney	0:54	425.00	382.50
02/01/2017	Work on preparation for continuation of status/evidentiary hearing; review transcripts of prior hearing, work on closing statement. - Christopher Carney	4:18	425.00	1,827.50
02/02/2017	Review draft of materials for award of diversion funds. - Christopher Carney	0:36	425.00	255.00
02/03/2017	Work on preparation for status hearing; review compliance plans, transcripts and exhibits. - Christopher Carney	4:18	425.00	1,827.50
02/08/2017	Review DSHS January report to monitor and appendices. Cross reference with past reports. - Christopher Carney	2:42	425.00	1,147.50
02/09/2017	Prepare for and attend telephonic status hearing. - Christopher Carney	4:06	425.00	1,742.50

02/10/2017	Review Defendants' draft triage memo to system partners, draft response re: Plaintiffs' concerns with same. - Christopher Carney	0:48	425.00	340.00
02/14/2017	Correspondence with defense counsel regarding settlement of appeal. - Christopher Carney	0:24	425.00	170.00
02/15/2017	Review and analyze declaration of Kinlen and appendices re: compliance. - Christopher Carney	1:24	425.00	595.00
02/16/2017	Review court's order on status hearing. - Christopher Carney	0:24	425.00	170.00
02/17/2017	Review court's order expanding monitor's authority. - Christopher Carney	0:12	425.00	85.00
02/21/2017	Receive and review court monitor's consultant reports on alternate sites. - Christopher Carney	1:06	425.00	467.50
02/24/2017	Review weekly waitlist data from Defendants. - Christopher Carney	0:18	425.00	127.50
02/27/2017	Review Defendants' motion for reconsideration and supporting materials. - Christopher Carney	1:42	425.00	722.50
03/02/2017	Telephone conference with monitor re: Plaintiffs' input on new draft of triage protocol. Review prior drafts of triage protocol. - Christopher Carney	0:24	425.00	170.00
03/07/2017	Review court order for response to Defendants' motion for "clarification." Begin work on response. - Christopher Carney	1:18	425.00	552.50
03/09/2017	Preparation for upcoming status hearing; review Kinlen and Reyes declarations and appendices. - Christopher Carney	2:06	425.00	892.50
03/11/2017	Work on drafting and editing response to Defendants' motion for clarification/reconsideration. - Christopher Carney	1:42	425.00	722.50
03/13/2017	Work on motion to approve settlement; work on response to motion for reconsideration. - Christopher Carney	1:48	425.00	765.00
03/15/2017	Work on motion to approve settlement, review/edit Defendants' changes. - Christopher Carney	0:36	425.00	255.00
03/15/2017	Receive and review Kinlen contempt data declaration and appendices. - Christopher Carney	1:18	425.00	552.50
03/16/2017	Work on motion to approve settlement. - Christopher Carney	0:36	425.00	255.00
03/17/2017	Receive and review monitor's report, preparation for status hearing. - Christopher Carney	3:18	425.00	1,402.50
03/17/2017	Work on motion to approve settlement. - Christopher Carney	0:24	425.00	170.00
03/20/2017	Work on preparation for status hearing, review pleadings and exhibits. - Christopher Carney	2:54	425.00	1,232.50
03/21/2017	Preparation for status hearing; travel, represent clients at status hearing. - Christopher Carney	4:18	425.00	1,827.50
03/21/2017	Prepare for status hearing, travel and attend status hearing. - Christopher Carney	4:06	425.00	1,742.50
03/29/2017	Work on review of jail admission screening tools provided by monitor, for possible relevance to triage protocol. - Christopher Carney	1:06	425.00	467.50
04/03/2017	Review February monthly report from Defendants. - Christopher Carney	0:42	425.00	297.50
04/07/2017	Review declaration of C. Reyes and appendices filed for status hearing. - Christopher Carney	0:54	425.00	382.50
04/08/2017	Review Defendants' "request for additional guidance." - Christopher Carney	0:12	425.00	85.00
04/08/2017	Receive and review March final monthly report from Defendants. - Christopher Carney	1:42	425.00	722.50
04/10/2017	Work on response to Defendants' new draft triage protocol, review prior drafts and monitor's literature on screening. - Christopher Carney	0:42	425.00	297.50
04/13/2017	Work on correspondence to Defendants' re: triage protocol. - Christopher Carney	0:18	425.00	127.50
04/13/2017	Work on response to Defendants' request for additional guidance, as per court's order. - Christopher Carney	1:06	425.00	467.50
04/14/2017	Receive and review Kinlen declaration and appendices re: compliance/contempt data. - Christopher Carney	1:18	425.00	552.50

04/17/2017	Work on preparation for status hearing, review pleadings and exhibits, monitor report and appendices. - Christopher Carney	3:54	425.00	1,657.50
04/17/2017	Work on response to Defendants' request for additional clarification, file same. - Christopher Carney	0:30	425.00	212.50
04/18/2017	Preparation for status hearing; travel, represent clients at status hearing. - Christopher Carney	4:36	425.00	1,955.00
04/19/2017	Review current waitlists, cross-reference with prior lists. Defendants falling further out of compliance. - Christopher Carney	1:06	425.00	467.50
04/20/2017	Work on proposed order adopting parties' settlement agreement. - Christopher Carney	1:18	425.00	552.50
05/09/2017	Work on case strategy preparation; legal research, review pleadings and exhibits. Correspondence with public defenders re: triage implementation. - Christopher Carney	3:54	425.00	1,657.50
05/11/2017	Receive and review April monthly report from Defendants, cross-reference with past reports. - Christopher Carney	1:54	425.00	807.50
05/12/2017	Work on letter to Defendants re: triage. - Christopher Carney	0:18	425.00	127.50
05/13/2017	Receive and review Defendants' plan to wind down alternate sites with appendices; compare to prior reports. - Christopher Carney	2:54	425.00	1,232.50
05/15/2017	Review contempt data declaration of Kinlen, cross-reference with prior reports. - Christopher Carney	1:18	425.00	552.50
05/17/2017	Work on response to Defendants' alternate sites wind-down plan. - Christopher Carney	0:54	425.00	382.50
05/19/2017	Review Monitor's comments on Defendants' wind-down plan. - Christopher Carney	0:30	425.00	212.50
05/20/2017	Work on preparation for conference call re: wind-down plan; review trial testimony, declarations and exhibits for prior statements of defense witnesses relevant to timelines for wind-down. - Christopher Carney	2:54	425.00	1,232.50
05/21/2017	Work on preparation for conference call re: wind-down plan. - Christopher Carney	1:18	425.00	552.50
05/23/2017	Review ward status exhibit produced by Defendants. - Christopher Carney	0:12	425.00	85.00
05/24/2017	Participate in conference call with Monitor and Defendants re: wind-down plan. - Christopher Carney	2:06	425.00	892.50
05/25/2017	Review Defendants' follow up documents re: wind-down plan. - Christopher Carney	0:48	425.00	340.00
05/25/2017	Work on letter to Defendants, following up on conference call re: wind-down plan. - Christopher Carney	0:54	425.00	382.50
05/26/2017	Review Kinlen declaration for upcoming status hearing, cross-reference with past declarations and exhibits. - Christopher Carney	1:54	425.00	807.50
05/30/2017	Work on agree/disagree matrix for report to court on wind-down plan. Legal research. - Christopher Carney	1:42	425.00	722.50
05/31/2017	Work on draft of report to court on wind-down plan. - Christopher Carney	1:24	425.00	595.00
06/01/2017	Work on preparation for status hearing; review pleadings, declarations and transcripts. - Christopher Carney	4:18	425.00	1,827.50
06/02/2017	Work on report to court relating to wind-down plan. - Christopher Carney	2:18	425.00	977.50
06/05/2017	Prepare for status hearing, travel, represent clients at status hearing. - Christopher Carney	4:54	425.00	2,082.50
06/06/2017	Receive and review Defendants' monthly report to Monitor, cross-reference data with past reports. - Christopher Carney	1:54	425.00	807.50
06/08/2017	Prepare for and conduct telephone conference with public defense administrator concerning availability of contract evaluators. - Christopher Carney	0:54	425.00	382.50
06/15/2017	Review letter from Defendants re: triage protocol. - Christopher Carney	0:12	425.00	85.00
06/15/2017	Review Kinlen contempt data declaration and exhibits. - Christopher Carney	0:54	425.00	382.50

06/16/2017	Review statement of capabilities for proposed Building 27 architects. - Christopher Carney	0:12	425.00	85.00
06/21/2017	Work on review of documents relating to RFI for panel evaluators, draft information request to Defendants re: same. Work on possible future motions. - Christopher Carney	1:42	425.00	722.50
06/29/2017	Receive Defendants' responses to panel evaluator RFI, cross-reference with other documents. - Christopher Carney	0:36	425.00	255.00
06/30/2017	Review documents and summaries of Washington State legislature's budget for DSHS in upcoming biennium, compare with case documents. - Christopher Carney	0:42	425.00	297.50
				Subtotal: 260,259.50